

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

IN RE:)	
)	
MATTHEW JOSEPH LAUDIG,)	BANKRUPTCY NO. 19-22676-KL
)	CHAPTER 13
DEBTOR.)	

**RESPONSE TO MOTION FOR RELIEF FROM STAY
AND FOR ABANDONMENT**

Debtor by Counsel responds to Brian Hecimovich's Motion for Relief From Stay and For Abandonment as follows:

1. Debtor intends to make the real estate at 807 E. Ridge Road in Gary, Indiana his primary residence since he and his spouse are no longer living together and legal proceedings have commenced to dissolve the marriage.
2. Debtor replaced the furnace thereto within the past three to five years and it needs additional repairs before he can live there.
3. Debtor's relocation to 807 E. Ridge Road in Gary Indiana will enable him to significantly lower his monthly household expenses, since no mortgage is owed on the real estate, which will increase the likelihood that he will successfully complete his Chapter 13 plan.
4. Debtor's Schedule J. provides for the expected monthly allocation to pay the real estate taxes and homeowners insurance therein.

WHEREFORE, for the preceding reasons, Debtor by Counsel request the Court deny Brian Hecimovich's Motion for Relief from Stay and for Abandonment and for all other equitable relief.

Dated: February 11, 2020

/s/RICARDO B. CASAS

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CERTIFICATE OF SERVICE

I, the undersigned, namely, Ricardo B. Casas, an attorney licensed to practice law in the State of Indiana, do state under oath that on the 11th day of February, 2020, a copy of the **Response to Motion for Relief from Stay and for Abandonment** was electronically mailed to the U.S. Trustee, the Chapter 13 Trustee, Paul Chael, and sent by regular to the Debtor and to Brian Hecimovich c/o David M. Blaskovich, 2850 45th Street, Highland, Indiana 46322 by placing the foregoing in an envelope having proper postage and depositing the same in the U.S. Mail.

/s/ Ricardo B. Casas
RICARDO B. CASAS

I HEREBY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE PRECEDING STATEMENT IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE, BELIEF, AND RECOLLECTION.

/s/ Ricardo B. Casas
RICARDO B. CASAS
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